

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Establishment of an Interference

Temperature Metric to Quantify and

Manage Interference and to Expand

Available Unlicensed Operation in Certain

Fixed, Mobile and Satellite Frequency

Bands

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ET Docket No. 03-237

TO: The Commission

COMMENTS OF IDAHO POWER

Pursuant to Section 1.415 of the FCC's Rules,¹ Idaho Power hereby submits its Comments in above-captioned proceeding in response to the Federal Communications Commission's ("FCC's" or "Commission's") Notice of Inquiry ("NOI") and Notice of Proposed Rulemaking ("NPRM") in ET Docket No. 03-237.² In the NPRM, the FCC has proposed to use a new "interference temperature" concept to allow significantly increased power limits for unlicensed devices operating in the bands relied upon by Idaho Power and many other critical infrastructure and public safety licensees for point-to-point microwave service. In concurrence with the comments provided by PacifiCorp, and for the reasons discussed herein, Idaho Power urges the Commission to delay action on this NPRM regarding this untried concept, and to conclude its NOI to allow the critical infrastructure industries, including the electric utilities, government licensees, manufacturers and others an opportunity to intelligently respond to a well defined NPRM.

¹ 47 C.F.R. § 1.415.

² *In re Establishment of an Interference Temperature Metric to Quantify and Manage Interference and to Expand Available Unlicensed Operation in Certain Fixed, Mobile and Satellite Frequency Bands*, ET Docket No. 03-237, 18 FCC Rcd 25309 (Nov. 28, 2003); 69 Fed. Reg. 2863 (Jan. 21, 2004) (establishing Comment deadline as April 5, 2004, and Reply Comment Deadline as May 5, 2004).

Idaho Power operates facilities for the provision of Electric Service across south central and Southern Idaho and partly into bordering states. Idaho Power provides electric service to 350,000 residential, 54,000 commercial & Industrial and 14,000 agricultural irrigation customers in a service area of 20000 square miles. Idaho Power owns and operates 3661 Mega Watts of generation facilities, owns and maintains 4657 miles of transmission lines and 44,270 miles of distribution lines. Idaho Power's communication infrastructure includes a total of 25 licensed 6 GHz microwave paths (50 redundant transmitters). These 6 GHz microwave paths carry transmission line protection, control, telecommunication and data circuits that are critical to operations.

After reading the document submitted for comment by PacifiCorp³, Idaho Power's position is much the same as theirs, we are in full agreement with and support PacifiCorp's position. Consequently objections expressed by PacifiCorp are also true for Idaho Power. In additional elaboration we submit the following:

Microwave system design is well understood and proven. The integrity and security of the Power grid is contingent on designed and tested availability of power line protection circuits. Idaho Power's electric grid as well as all Western North American electric utilities' grids is synchronized to and, under normal operating conditions, inseparable from the Western North American Power grid. If unlicensed users are allowed to emit on frequency, in line and in proximity to, receivers of licensed 6 GHz power utility users, so as to raise the noise floor in the band of use, availability of circuits, including power line protection circuits, carried by those radios will decrease⁴. This could jeopardize the integrity and stability of the Power grid. This outcome is true regardless of how the interfering emitter is modeled including the proposed "interference temperature metric" model.

In light of the recent report from NERC (February 10, 2004) of the east coast power blackout on August 14, 2003, it is plausible that the aforementioned decreased availability of circuits, could contribute to or even precipitate a similar such event. Subsequent power restoration could likewise be severely hampered.

Respectfully submitted:

Idaho Power

By: Robert D. Wright
Communications Engineering
4/2/2004

³ Comments (forthcoming as of 4/2/04) submitted to ET Docket 03-237 by PacifiCorp

⁴ Comments (forthcoming as of 4/2/04) submitted to ET Docket 03-237 by Harris